

**IN THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF PUERTO RICO**

**PAULSON PRV HOLDINGS LLC  
ET AL.,**

Plaintiffs,

v.

**FAHAD GHAFAR, ET AL.,**

Defendants.

**CIV. NO. 23-1521(SCC)**

**SECOND MOTION FOR EXTENSION OF TIME TO FILE SURREPLY**

COME NOW Plaintiffs Paulson PRV Holdings LLC; Duo Condado JV Holdings LLC; Bahia Beach Holding Company LLC; AIP PR Holdings LLC; Condado Duo La Concha SPV, LLC; Condado Duo Vanderbilt SPV, LLC; Condado Duo Vanderbilt Hotel Towers SPV, LLC; SJ Beach PR LLC; Regency Acquisition LLC; Bahia Beach Resort LLC; Bahia Beach CH Development LLC; and Ocean Drive Development LLC (collectively, where appropriate, “Plaintiffs”), through the undersigned counsel, and hereby request an extension of time proportional to that requested, and obtained, by Defendant Nerissa Aponte to file their surreplies to the pending replies. In support thereof, Plaintiffs state as follows:

1. On October 2, 2024, Farah Vayani and Syber Group LLC and Fahad Ghaffar and Thinking Ahead LLC filed replies in support of their respective motions to dismiss. (*See* Docket Nos. 157 and 158.) Defendant Nerissa Aponte requested until October 8, 2024 to finalize and file her reply.<sup>1</sup> (*See* Docket No. 160.)
2. Considering the voluminous and complex replies already filed, and the fact that Aponte had requested an extension of time to file her reply, Plaintiffs requested a 45-day extension of time to file their replies. (*See* Docket No. 161.)

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<sup>1</sup> Plaintiffs did not oppose Nerissa’s request.

3. The Court granted the Plaintiffs' request in part and ordered them to file their surreplies on or before November 1, 2024. (*See* Docket No. 164.) This extension afforded the plaintiffs 23 days from the filing of the last reply to file their surreply.
4. Since then, however, Defendant Nerissa Aponte requested and obtained an additional 7-day extension of time to file her reply. (*See* Docket Nos. 165 and 166.) While the plaintiffs certainly do not oppose the request, the extension materially reduces the plaintiffs' time to present their surreply.
5. Accordingly, to afford the plaintiffs with the same 23-day timeframe from the filing of the final reply to file their surreply, Plaintiffs respectfully request a 7-day extension of time, until November 8, 2024, to file their surreplies.
6. This request is made in good faith, without any dilatory intent, and in the interest of justice. Most importantly, other parties have been afforded similar extensions of time in the past.

**WHEREFORE** Plaintiffs respectfully request the Court GRANT this motion, with any additional relief the Court deems just.

**WE HEREBY CERTIFY** that on this date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

**RESPECTFULLY SUBMITTED** in San Juan, Puerto Rico, on October 10, 2024.

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